

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**FARMERS TELECOMMUNICATIONS)
COOPERATIVE, INC.,)**

Plaintiff,)

v.)

CIVIL ACTION NO. 2:06-cv-00790-WC

**VERIZON BUSINESS NETWORK)
SERVICES INC. and QWEST)
COMMUNICATIONS CORPORATION,)**

Defendants.)

JOINT STIPULATION AGREEING TO DELAY COMMENCEMENT OF DISCOVERY

Plaintiff Farmers Telecommunications Cooperative, Inc. ("Farmers") and Defendants Verizon Business Network Services Inc. ("Verizon Business") and Qwest Communications Corporation ("QCC") jointly file this stipulation evidencing the parties' mutual agreement to delay discovery in the above-styled cause until February 15, 2007 and respectfully request the inclusion of these provisions in the scheduling order to be issued by this Court. In support of said stipulation, the parties state as follows:

1. In an unopposed motion seeking an extension of time filed by the Plaintiff on December 15, 2006, the defendants' answers or other responsive pleadings are to be filed no later than January 29, 2007.

2. The parties intend to engage in settlement discussions to facilitate a resolution of these issues and therefore, have agreed to delay all forms of discovery until a date subsequent to the January 29, 2007 deadline for filing answers.

3. Pursuant to Fed. R. Civ. P. 26(f), the parties are finalizing arrangements for a conference between the parties. The parties stipulate that the written report of said conference will require each party to provide the initial disclosures required by Fed. R. Civ. P. 26(a)(1), on or before February 15, 2007.

4. Notwithstanding Fed. R. Civ. P. 26(d), which allows parties to begin seeking discovery once the Rule 26(f) conference has occurred, the parties stipulate that no forms of discovery will be permitted until February 15, 2007.

Respectfully submitted on this 15th day of December, 2006.

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